

1 Angela C. Agrusa (SBN 131337)
angela.agrusa@dlapiper.com

2 David B. Farkas (SBN 257137)
david.farkas@dlapiper.com

3 DLA PIPER LLP (US)
1100 Glendon Avenue, 14th Floor
4 Los Angeles, California 90024.3518
Telephone: (310) 500-3500
5 Facsimile: (310) 500-3501

6 Attorneys for Defendants HILTON
WORLDWIDE HOLDINGS, INC. and HILTON
7 GRAND VACATIONS COMPANY, INC.

8
9
10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12

13 TIMOTHY ELDER, individually and
on behalf of all others similarly situated,

14 Plaintiff,

15 vs.

16 HILTON WORLDWIDE HOLDINGS,
17 INC. and HILTON GRAND
VACATIONS COMPANY, INC.,

18 Defendant.
19

Case No. 3:16-cv-00278

**JOINT STIPULATION
REGARDING REQUEST FOR
EXTENSION OF TIME TO
RESPOND TO ORDER
REGARDING PRELIMINARY
APPROVAL OF SETTLEMENT**

Hon. Jon S. Tigar

Action Filed: January 15, 2016

1 Plaintiff TIMOTHY ELDER (“Plaintiff”), and Defendants HILTON
2 WORLDWIDE HOLDINGS, INC. and HILTON GRAND VACATIONS
3 COMPANY, INC. (collectively, “Hilton”), by and through their undersigned
4 attorneys (collectively, the “Parties”) hereby stipulate as follows:

5 **WHEREAS**, Plaintiff filed this action on January 15, 2016;

6 **WHEREAS**, the Parties executed a Settlement Agreement resolving the
7 claims in this action;

8 **WHEREAS**, on June 16, 2017, Plaintiff filed a motion for preliminary
9 approval of the settlement (Dkt. No. 75);

10 **WHEREAS**, on October 10, 2017, the Court issued an Order directing
11 Plaintiff to submit additional briefing regarding the settlement by October 31, 2017
12 (Dkt. No. 83);

13 **WHEREAS**, the Parties have conferred regarding the Court’s Order and the
14 issues raised thereby and believe that an additional two weeks is necessary to
15 respond to the Court’s inquiries;

16 **STIPULATION AND SIGNATURES**
17 **APPEAR ON THE FOLLOWING PAGES**

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 THEREFORE, IT IS HEREBY STIPULATED between the Parties, by and
2 through their respective attorneys of record and/or representative(s), and subject to
3 the approval of the Court, the Plaintiff shall have until November 14, 2017 to submit
4 additional briefing to the Court pursuant to the Court's October 10, 2017 Order.
5

6 Dated: October 24, 2017 BURSOR & FISHER, P.A.
7
8

9 By: /s/ L. Timothy Fisher
10 L. Timothy Fisher
11 Attorneys for Attorneys for Plaintiff

12 Dated: October 24, 2017 DLA PIPER LLP (US)
13
14

15 By: /s/ Angela C. Agrusa
16 Angela C. Agrusa
17 Attorneys for Defendants HILTON
18 WORLDWIDE HOLDINGS, INC. and
19 HILTON GRAND VACATIONS
20 COMPANY, INC.
21
22
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Dated: October 24, 2017

By: /s/ Angela C. Agrusa
 Angela C. Agrusa
 Attorneys for Defendants HILTON
 GRAND VACATIONS COMPANY, LLC

1 Pursuant to the Joint Stipulation regarding an extension to respond to the
2 Court's October 10, 2017 Order (Dkt 83), **IT IS SO ORDERED.**

3
4 DATED October 25, 2017, 2017

5
6 

7 HON. JON S. TIGAR
8 United States District Judge
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28